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March 3, 2020

**Via E-Filing**

The Honorable Sherry R. Fallon  
United States District Court, District of Delaware  
844 N. King Street  
Wilmington, Delaware 19801

**Re: *Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis*  
*v. Key Commercial Finance, LLC, et. al.*,  
No. 1:18-cv-01516-CFC/SRF**

Dear Judge Fallon,

I represent Plaintiff, Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis ("Estate"). At the Estate's request, Your Honor scheduled a conference call to address a discovery dispute on March 11, 2020 at 4:00 p.m. Unfortunately, I am now unavailable to participate at that time as I am meeting in Washington, D.C. with a client and a mediator at 3:30 p.m. in anticipation of a two-day mediation starting on March 12, 2020. I have conferred with opposing counsel, and the parties are available after 12:00 p.m. on March 12, 2020, and before 2:00 p.m. on March 13, 2020. If any of those times are convenient for Your Honor, I respectfully request the Court reschedule the discovery call.

The Honorable Sherry R. Fallon

March 3, 2020

Page 2

I apologize for the inconvenience and appreciate the Court's consideration.

Respectfully,

*/s/ Joelle E. Polesky*

Joelle E. Polesky (ID No. 3694)

cc: Theodore Kittila, Esquire (via email)  
James G. McMillan, III, Esquire (via email)  
William Mahoney, Esquire (via email)